

EXHIBIT 132

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Defendants.

DECLARATION OF BRENDA J. ALLEN

I, BRENDA J. ALLEN, hereby declare and affirm:

1. I am the Vice Chancellor for Diversity and Inclusion (Chief Diversity Officer) at the University of Colorado Denver and the Anschutz Medical Campus. I also am a Professor of Communication. Since 1989, I have been employed in various roles at three of the four campuses of the University of Colorado (CU), beginning as an Assistant Professor at CU Boulder. I have also served at CU Denver as a Department Chair and Associate Dean, and as an Associate Vice Chancellor for Diversity and Inclusion at CU Denver and CU Anschutz. My primary area of scholarship is diversity and organizational communication, with an emphasis on institutions of higher education. I have achieved statewide and national recognition for my research, teaching, service, training, and consultations related to diversity, equity, and inclusion.

2. I have either personal knowledge of the matters set forth below or, with respect to those matters for which I lack personal knowledge, have reviewed information gathered from University records by colleagues within the organization.

3. The guiding principles of the University of Colorado call on its campuses to “[p]romote faculty, student, and staff diversity to ensure the rich interchange of ideas in the pursuit of truth and learning, including diversity of political, geographic, cultural, intellectual, and philosophical perspectives.” (Mission, Guiding Principles and Vision Statement *available at* <http://www.cu.edu/mission-university-colorado-guiding-principles-and-vision-statement>). Since 2012, the University has welcomed recipients of Deferred Action for Childhood Arrivals (DACA) status as students and staff. The University has done this because we view a diverse student body as critical to providing a high quality education and ensuring that we expose our

students to unique perspectives in their academic and co-curricular experiences to prepare them to succeed in an increasingly multicultural world.

4. Acknowledging the value of DACA students, the state of Colorado passed the Advancing Students for a Stronger Economy Tomorrow (ASSET) Bill in 2013, codified at C.R.S. § 23-7-110. The law allows eligible, undocumented students at all public colleges and universities to pay in-state tuition. Further, the state provides select eligible students with an annual \$5,000 grant to reduce the burden on them and their families.

5. While the University does not keep centralized records of students who are DACA recipients, recent estimates by various staff and faculty at all four campuses suggest that there are over 200 DACA students enrolled across the University. With 17,000 total Colorado residents holding DACA status, and based on the increasing numbers of students who seek guidance at CU Denver's Undocumented Student Services Office, it is reasonable to assume that the number across all four campuses is substantial. Moreover, many students who are documented may have family members who are DACA recipients. If DACA were to be rescinded, it would also impact those students' well-being.

6. Like many young people in the United States, DACA students have dreams of leading a successful life. They are pursuing higher education as a way to realize their parents' aspirations of a better life and to honor their parents' sacrifices. They also have made a significant impact on our campuses. DACA students participate in various academic programs across CU. They also are integral to CU's student life and culture. Many are leaders of student government, student clubs, and community organizations. Some of them are student employees at various sites on our campuses (e.g., student services offices, residence halls, dining facilities and research laboratories). My office employs three DACA students.

7. If the DACA program is discontinued, many of these students would be forced to withdraw from the University system. Numerous DACA students rely on on-and-off campus employment throughout the school year and during the summer to pay for educational and living expenses. Ending DACA, and thus taking away their employment eligibility, would virtually foreclose their ability to complete their education. Those students enrolled in any program that requires work experience to graduate – such as paid internships, residency training, research, or teaching positions –would see their pathway to graduation closed. The students who currently participate in work-study would lose a valuable source of learning, and the faculty who rely on these students will lose their hard work and bright minds. If DACA is rescinded, many of these students may not continue their education because they will not be able to start a career upon graduation, or to pursue graduate studies. Perhaps more important, many students feel they cannot risk continuing their education because they fear deportation. If they are forced to withdraw from CU, student life and the overall student experience on campus will be negatively impacted because these students make significant academic and social contributions to our campuses.

8. For those DACA students who choose to remain in school, the risk of deportation will place a tremendous strain on their mental well-being. For many, the United States is the only home they have ever known. Some do not even speak the language of the country to which they may be deported. The constant worry of detection and arrest does not foster the ideals of inclusiveness on which our University prides itself. Even those students who are able to graduate will be unable to gain lawful employment, virtually eviscerating the value of their degree.

9. I know many DACA students on our campuses, and I have witnessed firsthand the negative impacts of the threat of rescission of DACA. I have also heard accounts from staff and faculty who work closely with these students. DACA students, as well as their friends, family, and community supporters, are under extreme stress. Many of them are frightened, anxious, and demoralized. Consequently, they are finding it hard to focus on their studies. Although our campuses have offered counseling and legal assistance, many students have not accepted those offers, in large part due to fear of disclosing their status. They are afraid that they will be taken from their families. Furthermore, many students, staff, and faculty who care about these students (including me) are feeling disheartened and dismayed.

10. Should DACA protection be withdrawn, the University of Colorado system stands to lose a significant source of funding. More than 77% of the University's revenue comes from tuition, a far higher number than other public university systems. Any action which reduces our ability to recruit and retain students harms not just those registered for DACA, but all students, who would need to bear a larger financial burden or accept reduced services from the school. Furthermore, since our students typically do not leave Colorado when they graduate, our state will also feel an impact on its economy.

11. DACA students arrived in this country through no fault of their own. For many, their parents wanted opportunities not available in their home country. For some, their families were fleeing war or violence. Others still came due to political and religious persecution. All of them, though, came to this country seeking a better life. By pursuing higher education at the University of Colorado, DACA students are fulfilling their parents' dream. Often the first in their families to attend college, they are seeking to make their community, their state, and their nation a better place.

I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and complete to the best of my knowledge.

Brenda J. Allen
Brenda J. Allen, Ph.D.

Vice Chancellor

University of Colorado Denver | Anschutz Medical Campus

State of CO, County of Denver
Signed before me on this 28 day
of Sept, 2017 by Brenda J. Allen
Notary Public Lisa Solerzano

